

EXHIBIT C

Natasha Prinzing Jones
(MT Bar No. 5226)
Matthew B. Hayhurst
(MT Bar No. 4979)
BOONE KARLBERG P.C.
201 West Main St., Suite 300
P.O. Box 9199
Missoula, MT 59807
Telephone: (406) 543-6646
Facsimile: (406) 549-6804
npjones@boonekarlberg.com
mhayhurst@boonekarlberg.com

Attorneys for Plaintiffs Samantha Alario, Heather DiRocco, Carly Ann Goddard, Alice Held, and Dale Stout

Ambika Kumar (*admitted PHV*)
DAVIS WRIGHT TREMAINE LLP
920 Fifth Avenue, Suite 330
Seattle, WA 98104-1610
Telephone: (206) 622-3150
Facsimile: (206) 757-7700
ambikakumar@dwt.com

Tim Cunningham (*admitted PHV*)
DAVIS WRIGHT TREMAINE LLP
1300 SW Fifth Avenue, Suite 2400
Portland, OR 97201
Telephone: (503) 241-2300
Facsimile: (503) 778-5299
timcunningham@dwt.com

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION

SAMANTHA ALARIO, HEATHER DIROCCO, CARLY ANN GODDARD, ALICE HELD, and DALE STOUT,

Plaintiffs,

v.

AUSTIN KNUDSEN, in his official capacity as Attorney General of the State of Montana,

Defendant.

Lead Case No.
9:23-cv-00056-DWM
CV 23-56-M-DWM

Member Case No.
CV 23-61-M-DWM

DECLARATION OF CARLY ANN GODDARD IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

I, Carly Ann Goddard, declare as follows:

1. I make this declaration from personal knowledge.
2. My husband and I grew up in the South and in 2019, we decided to move to the West to pursue our dream of ranching. We worked hard to get into the business. For about a year, my husband worked at a feedlot in Belfry, Montana, and I worked as a waitress. We lived frugally and eventually saved enough to move to a ranch in Yellowstone County, where my husband works on a cattle operation.
3. I joined TikTok in 2019 as a way to connect with others living and raising families in rural areas. At the time, I was feeling isolated as a new stay-at-home mom living in a remote place and was also struggling with postpartum depression. I had also recently testified at the trial of my grandfather, who sexually abused me when I was eleven years old. This experience brought back many traumatic memories.
4. On TikTok, I met a community of other mothers and formed many relationships. One day, I saw a video that another mother had posted on TikTok describing her day, and I decided to try creating videos about ranch life and parenting. I fell in love with the process and would wake up looking forward to creating videos and engaging with the TikTok community. Creating videos gave me a sense of purpose, passion, hope, and connection—working wonders for my mental health.

5. I love being able to share content about life on a ranch and to inspire other young mothers who may feel isolated, as I once did. Being able to show others that there is a light at the end of the tunnel no matter what you face in life is what I try to show every single day when I make my videos.

6. I also enjoy connecting with other mom creators on TikTok and sharing thoughts, experiences, and ideas. Whether learning a new healthy recipe for my family or checking in on a member of the community who is struggling, I have found TikTok to be such a positive and connecting force.

7. Over time, my videos became quite popular, and I developed over 101,000 followers. Because of this following, I have been able to generate substantial income from creating videos on TikTok. I raise income both through TikTok's Creator Fund (which pays creators based in part on their videos' performance and views) and through brand deals, where I discuss different products I use, usually for parenting and home décor. I typically earn between \$2,000 to \$4,000 every month from my TikTok videos. Because ranching is not a highly profitable business, the money I earn through TikTok approximately triples my family's monthly household income.

8. My family has come to rely on this income for our daily necessities, such as food, clothes, and doctor's visits. This money is a lifeline that allows us to continue to live on a small, remote Montana ranch—and allows me to raise my son

at home instead of working outside the home. I get to watch my son grow up and be with him every single day. We love our ranch life and do not want to leave, but may be forced to consider other options if I am unable to continue earning income through TikTok. Likewise, my husband and I would like to have more children, but given the uncertainty of the TikTok ban, we are holding off until we know whether we will be able to keep the income flow that I have worked so hard to build.

9. I have found much greater success as a creator on TikTok than on the other social media apps. For example, while I have over 101,000 followers on TikTok, I have only 157 followers on YouTube. The TikTok algorithm seems to more effectively share my content with audiences who appreciate it. Thus, if I no longer had access to TikTok, I would not simply be able to move my videos to another app and have the same audience.

10. To the contrary, if the Montana TikTok ban is allowed to take effect, I would be deprived of access to a community that I love and of income that my family and I have come to rely on.

I declare under penalty of perjury that the foregoing is true and correct.

Signed in Yellowstone County, Montana this 4th day of July, 2023.



Carly Ann Goddard